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FILED
Carbon County District Court
Rochelle Loyning, Clerk

APR 26 2011
by *Susan E. Meicall*
Susan E. Meicall, Deputy

MONTANA TWENTY-SECOND JUDICIAL DISTRICT COURT, CARBON COUNTY

STEPHANI B. McDONNELL

Plaintiff,

vs.

INTERSTATE DISTRIBUTOR CO., INC. and
PENNY CORN,

Defendants.

No. DV 11- 56 = ①
HON. BLAIR JONES

COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, and for her complaint against the defendants, alleges as follows:

1. The plaintiff is a resident of Carbon County, Montana.
2. Upon information and belief defendant Interstate Distributor Co., ("Interstate") is a corporation doing business in the State of Montana, and defendant Penny Corn is an employee of Interstate Distributor Co.
3. On or about June 25, 2008, the plaintiff was driving a vehicle near the City of Laurel, in the State of Montana.
4. On or about June 25, 2008, defendant Penny Corn was driving a vehicle owned by Interstate Distributor Co., while in the course and scope of her employment with Interstate. Corn negligently operated her vehicle, and collided with the plaintiff.
5. The defendant was under a duty to operate her vehicle in a safe and responsible manner so as to avoid causing an accident.

1 6. The defendant's breach of her duty of care proximately caused the collision with the plaintiff's
2 vehicle.

3 7. Interstate is liable for the torts of its employee committed in the course and scope of said
4 employee's work.

5 8. The plaintiff was seriously and permanently injured in the resulting collision and has and will
6 suffer severe pain and disability, disfigurement, mental anguish, loss of wages and loss of
7 earning capacity, loss of the enjoyment of life, medical expense and nonmedical expense and
8 loss of insurability.

9 9. WHEREFORE, Plaintiff prays that the Court award her damages for past and future
10 pain and suffering, disfigurement, disability, medical expense, nonmedical expense, loss of
11 enjoyment of life, mental anguish, lost wages, loss of earning capacity, loss of household
12 services, loss of insurability. Plaintiff also prays for pre- and post-judgment interest, costs and
13 such other and further relief as the Court may deem proper.

14 **JURY TRIAL**

15 The plaintiff hereby requests a trial by jury in this matter.

16 DATED: April 26, 2011

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18 RAYMOND G. KUNTZ
ATTORNEY AT LAW

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20 Raymond G. Kuntz